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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: June 29, 1977

SUBJECT: Glyphosate in or on pome fruits, PP No. 6F1861, TB response to CB memo of 6/9/77

FROM: TB/RD

TO: PM No. 25, Mr. R. Taylor

PP No. 6F1861

Monsanto  
St. Louis, Mo. 63166

CB memo (cf. title, above) recommends for requested tolerances (0.2 ppm) if nitrosoamine problem can be resolved.

CB finds that 0.2-0.4 ppm N-nitrosoglyphosate (NNG) are present in the Roundup formulation and from less than 1 ppb to up to 20 ppb NNG will be present in glyphosate-treated commodities, depending upon the method on which the calculation (or estimation) is based.

The previous deficiency cited by TB for this PP (by Mr. R. Landolt, memo of 3/15/77, this PP), which related to need for more histopath. data on lower-dosed rats in the two-year feeding of glyphosate, is now satisfied (cf. TB 4/18/77 memo by Dr. M. Quaife in PP No. 6F1758/FAP No. 6H5126). The question of NNG presence in pome fruits treated with glyphosate remains.

To help resolve the remaining deficiency, now relating to TOX, for tolerances requested in this petition, Petitioner is requested to supply any available TOX data on NNG, especially mutagenicity data. Should any mutagenicity testing be carried out on NNG by Petitioner, its value would be greatly enhanced if parallel tests were carried out on the known carcinogen, N-nitrosodimethylamine.

MLQ 6/30/77

Mary L. Quaife, Ph.D., TB/RD  
June 29, 1977